

EXHIBIT F

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT))
 ANTITRUST LITIGATION,)
) Case No. 07-5944 SC
) MDL No. 1917
 This Document Relates to:)
)
 ALL ACTIONS.)
)

HIGHLY CONFIDENTIAL

VOLUME I

DEPOSITION of NOBUO HARADA

May 20, 2015

Tami L. Le, RPR, CSR No. 8716
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V O L U M E I

Videotaped Deposition of NOBUO
HARADA, taken on behalf of the Toshiba
Defendants, at 501 W. Broadway,
19th Floor, San Diego, California,
commencing at 9:18 a.m., on Wednesday,
May 20, 2015, before Tami L. Le,
CSR No. 8716, RPR.

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12 The Videographer:

13 Brad Bissegger

14 The Interpreters:

15 Koko Peters
16 Teresa Sumiyoshi
17 Saori Bezouska

18 Also Present:

19 Michael Kraver, Sharp Electronics Corporation
20 Takafumi Yamamoto, Sharp Electronics Corporation
21
22
23
24
25

11:00 1 discussion about looking at the cost level.

2 Q BY MR. CURRAN: What did you do after you were
3 president of Sharp Manufacturing of Poland?

4 THE INTERPRETER: Can the interpreter just look
11:01 5 something up?

6 CHECK INTERPRETER SUMIYOSHI: Commissioned
7 employee, a contract employee.

8 THE INTERPRETER: Thank you.

9 THE DEPONENT: I retired from Sharp Corporation
11:01 10 in 2011, then continued for two years as the president
11 of Poland as a part-time employee -- or a commissioned
12 employee and then worked for Sharp Corporation for an
13 additional two years as a commissioned employee.

14 Q BY MR. CURRAN: So let me see if I understand
11:01 15 this. So you retired from Sharp Corporation in 2011?
16 That's the first question.

17 A Yes.

18 Q But you stayed at Sharp Manufacturing of Poland
19 for two more years as a part-time, commissioned
11:02 20 employee?

21 A Yes.

22 Q And were you working in Poland during that
23 period?

24 A Yes, the same.

11:02 25 Q And were you still the president of Sharp

11:02 1 Manufacturing of Poland?

2 A Yes.

3 Q So you were president of the company even
4 though you were a part-time, commissioned employee?

11:03 5 A I think really part-time is wrong. This --
6 what I was was a contract employee, a contract job, and
7 it's the same as being a regular employee, the
8 conditions were the same. It was just that I had
9 retired at one point and then I -- I retired and then
11:04 10 returned as this contract employee, so I was working
11 full-time. I don't think that we -- you really have
12 that type of a system in the United States.

13 Q And then after two years as a contract employee
14 at Sharp Manufacturing of Poland, did you move back to
11:04 15 Japan?

16 A Yes, I did.

17 Q And you worked as a contract employee for Sharp
18 at that time?

19 A I worked as a contract employee for Sharp
11:05 20 Corporation.

21 Q Okay. And what were your responsibilities?

22 A For the first year, I was project chief for a
23 new plant that was being commissioned in Indonesia for
24 white goods and I -- so I supported that as a project
11:05 25 chief.

11:05 1 Q And white goods, meaning refrigerators,
2 washers, dryers?

3 A (In English) Yes.

4 (Through the Interpreter) The new plant in
11:06 5 Indonesia was a plant for refrigerators and washing
6 machines.

7 Q No television manufacturing?

8 A There was some TV too.

9 Q LCD or CRT television?

11:06 10 A LCD.

11 Q And what about the second year with Sharp
12 Corporation?

13 A I was in the overseas planning department --
14 overseas site planning department and essentially I was
11:07 15 following up from Japan on the new plant -- mainly
16 the -- mainly the new plant in Indonesia.

17 Q Okay. So you retired in 2011 and then you were
18 a contract employee for four years; right?

19 A Yes.

11:08 20 Q Was that a single contract or multiple
21 contracts covering that four years?

22 A It was renewed each year.

23 Q Four back-to-back contracts?

24 A So four year -- for the span of four years,
11:08 25 each year the contract was renewed.

11:08 1 Q Right. With no gap in between?

2 A Gap?

3 Q Yeah, no hiatus, no interregnum.

4 A No.

11:09 5 Q All right. And then what did you do after the
6 fourth of those one-year contracts?

7 A That ended on January 21st of this year.

8 Q What did you do then?

9 THE INTERPRETER: Can the interpreter check the
11:10 10 gender?

11 MR. CURRAN: Yes.

12 THE DEPONENT: Then the president, Okayama,
13 from SEMA said -- asked me whether -- invited me to work
14 with him.

11:10 15 Q BY MR. CURRAN: And did you accept that
16 invitation?

17 A Yes, I did.

18 Q And when did you start working with SEMA again?

19 A March 24th of this year.

11:10 20 Q Were you employed between January 21st of this
21 year and March 24th of this year?

22 A No, I was not.

23 Q So you've now been working again at SEMA for
24 the past two months?

11:11 25 A Yes, that's correct.

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V O L U M E II

DEPOSITION OF NOBUO HARADA

May 21, 2015

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Videotaped Deposition of NOBUO
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commencing at 9:04 a.m., on Thursday,
May 21, 2015, before Tami L. Le,
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13:53 1 don't remember this very well, if import was to be
2 involved, then it would have been imported through
3 Los Angeles. So I think they wanted to perhaps control
4 it in the United States.

13:53 5 Q Okay. All right. But it's your understanding,
6 Mr. Harada, that the use of Nissin to receive components
7 was the choice of the component supplier and not SEMA?

8 MR. BENSON: Objection to form, lack of
9 foundation, mischaracterizes prior testimony.

13:54 10 THE DEPONENT: I think that was, indeed, the
11 condition and transportation was needed in order to
12 deliver to Mexico, so that's why they used it.

13 Q BY MR. CURRAN: Now, sir, as of today, you're a
14 contract employee of SEMA; is that right?

13:54 15 (Discussion among interpreters.)

16 THE DEPONENT: Yes.

17 Q BY MR. CURRAN: And you've been a contract
18 employee of SEMA since March 24th of this year; is that
19 right?

13:55 20 A Yes.

21 Q So you've been working for SEMA again now for
22 almost two months; is that right?

23 A Yes.

24 Q Where are you working physically?

13:55 25 A Now I am at SEMA four days a week, and the

13:55 1 other day I go to the plant in Mexico.

2 Q Why do you divide your time up that way now?

3 MR. BENSON: Objection to form, vague.

4 THE DEPONENT: My current work is to get new
13:56 5 businesses for SEMEX and it is -- it works out better to
6 be in the United States in order to cultivate new
7 business, so that is the reason why I am not in the U.S.
8 side.

9 Q BY MR. CURRAN: All right. Your job is to get
13:57 10 new business for SEMEX, not SEMA?

11 A Well, it will end up being the same thing,
12 but...

13 Q How long is your contract for?

14 A The contract doesn't really have an end date.

13:57 15 Q Do you have an expectation as to how long your
16 contract will last?

17 MR. BENSON: Objection to form, vague.

18 THE DEPONENT: Well, that would depend on what
19 happens, but I think it is for around a year.

13:58 20 Q BY MR. CURRAN: Is it a written contract, sir?

21 A Yes.

22 Q When did you sign it?

23 A I think it was in March, around one week before
24 I came to the U.S.

13:59 25 Q When did you come to the U.S.?

13:59 1 A It was March 24th.

2 Q Where are you living?

3 A I'm currently living in a town called Chula
4 Vista.

13:59 5 Q Can you please give me the address?

6 A 825 East Paloma (sic), Unit 503, Chula Vista
7 91911.

8 Q You have the zip code memorized already?

9 A Yes.

14:00 10 Q That's impressive.

11 MR. CURRAN: At this time I'd like to ask the
12 court reporter to mark another document.

13 It's a previously marked document so we don't
14 need that. It's been previously marked as Exhibit 3620
14:00 15 and Exhibit 3620E. I'll read the Bates number anyway,
16 SHARP-CRT-00212452 through -476.

17 (Document handed to counsel and the deponent.)

18 Q BY MR. CURRAN: So, Mr. Harada, of course
19 please take a moment to familiarize yourself with 3620
14:01 20 and then I'll ask you some questions about it.

21 A (Reviewing document.)

22 Yes.

23 Q Mr. Harada, what is this document?

24 MR. BENSON: Objection to form, lack of
14:03 25 foundation.